

ORIGINAL



0000077526

BEFORE THE ARIZONA CORPORATIO

RECEIVED

COMMISSIONERS

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

OCT 05 2007

DOCKETED BY

MR

In the matter of:

EDWARD A. PURVIS and MAUREEN H.
PURVIS, husband and wife
1231 W. Shannon
Chandler, Arizona 85224

GREGG L. WOLFE and ALLISON A.
WOLFE, husband and wife
2092 W. Dublin Ln., Chandler, Arizona 85224

NAKAMI CHI GROUP MINISTRIES
INTERNATIONAL, (a/k/a NCGMI), a
Nevada corporation sole
4400 N. Scottsdale Road, Suite 9-231
Scottsdale, Arizona 85251

JAMES W. KEATON, Jr. and JENNIFER
KEATON, husband and wife
11398 E. Whitehorn Drive, Apt. D
Scottsdale, Arizona 85255

ACI HOLDINGS, INC., a Nevada corporation
17650 N. 25th Ave., Phoenix, Arizona 85023

Respondents.

Docket No. S-20482A-06-0631

**RESPONDENT PURVIS'
MOTION TO COMPEL
PRODUCTION OF KEATING/
ACI/CIS DOCUMENTS
PURSUANT TO SUBPOENA**

AND

**UNREDACTED DOCUMENTS
FROM SECURITIES DIVISION**

MEMORANDUM OF POINTS AND AUTHORITIES

On August 29, 2007, this Court authorized the issuance of subpoenas for documents in possession of and produced to the Securities Division by Respondents James Keaton and his companies ACI and CSI. The Court has ruled that those documents are discoverable, and that Purvis is entitled to copies of them. The documents were produced to the Securities Division by Mr. Keaton under the Bates numbers which are identified on Exhibit "A" attached hereto. Copies, however, were not provided to Purvis.

1 The subpoena was issued and served on Keaton/ACI/CSI. After the Court ordered
2 that the subpoena be issued, the Securities Division changed course and said that it would
3 produce the documents received from Keaton. The Securities Division, however, has
4 unilaterally redacted information from those documents. [See Exhibit "B" hereto.] The
5 Securities Division relies upon A.R.S. §§ 44-1373 and 44-2042¹ as the legal authority
6 authorizing the redaction. [See Exhibit "C" hereto.] The Securities Division has refused
7 to produce unredacted documents.

8 Mr. Keaton has agreed to produce all documents called for by the subpoena except
9 financial information provided to the Securities Division regarding him, ACI, and CSI. In
10 an effort to avoid a dispute, counsel for Purvis asked the Securities Division whether any
11 of the allegations against Mr. Purvis are based on, related to, or are relevant to the
12 financial information of Keaton, ACI or CSI. The Securities Division refused to provide a
13 straight answer. [See Exhibit "D" hereto.]

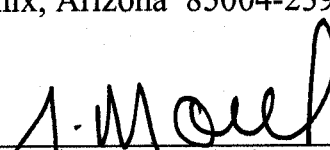
14 In sum, Purvis has not received the documents he is entitled to. Purvis accordingly
15 has been forced to file this motion to compel the production of documents responsive to
16 the subpoena served on Keaton, including the financial information being withheld.

17 Further, Respondent Purvis moves the Court to overrule the ACC's confidentiality
18 objection and to provide documents in an unredacted form.

19 RESPECTFULLY SUBMITTED this 5th day of October, 2007.

20 QUARLES & BRADY LLP
21 Renaissance One, Two North Central Avenue
22 Phoenix, Arizona 85004-2391

23 By


24 John Maston O'Neal
25 Zachary Cain

26 Attorneys for Respondents
27 Edward A. Purvis and Maureen H. Purvis
28

¹ A.R.S. §44-1373 requires the redaction of social security numbers only. However, the Securities Division has redacted witness names, addresses, telephone numbers, contact information, and other information it deems "confidential," relying upon A.R.S. §44-2042. Respondent does not know what was actually removed from the documents.

1 **ORIGINAL and 13 COPIES** filed by hand-
2 delivery this 5th day of October, 2007, with:

3 Docket Control, Arizona Corporation Commission
4 1200 West Washington
5 Phoenix, AZ 85007

6 **COPY** hand-delivered this 5th day of October, 2007, to:

7 ALJ Marc Stern
8 Arizona Corporation Commission/Hearing Division
9 1200 West Washington
10 Phoenix, AZ 85007

11 **COPY** of the foregoing faxed and mailed
12 this 5th day of October, 2007, to:

13 Mattew Neubert, Securities Division
14 Arizona Corporation Commission
15 1200 West Washington
16 Phoenix, AZ 85007

17 Rachel Strachan, Securities Division
18 1300 West Washington St., 3rd Floor
19 Phoenix, Arizona 85007

20 Ashley Adams
21 Ryan, Rapp & Underwood, P.L.C.
22 3101 North Central Avenue
23 Phoenix, AZ 85012

24 Frances Inliver
25
26
27
28

EXHIBIT A



PHOENIX LAW GROUP

Feldman Brown Wala Hall & Agena, PLLC

Ashley Adams Feldman

Attorney at Law

Direct Dial: 480-444-1277

E-mail: aadams@phoenixlawgroup.com

October 20, 2006

Rachel Strachan
Arizona Corporation Commission
Securities Division
1300 W. Washington, 3rd Floor
Phoenix, AZ 85007-2996
Facsimile: (602) 257-8110

Re: Jim Keeton/ACI

Dear Rachel:

Enclosed are all of the documents in ACI and Jim Keeton's possession that are responsive to the subpoena. I have prepared an index regarding which documents have been included and have described to which items such documents are responsive. In addition to the documents and index, we have also provided you with a CD Rom which represents the QuickBooks of ACI Holdings' companies. ACI and its related entities switched to QuickBooks in or around July of 2003. ACI has little, if any accounting or financial records which predate the change to QuickBooks. Some records are stored on a computer which has not been working for quite some time.

In addition, ACI Power Systems/Precision Power Labs (ACIPS/PPL) has not been wholly owned by ACI Holdings this past year so its financials are no longer consolidated with ACI and the other companies. ACIPS/PPL will file a separate tax return for its fiscal year which ended 6/30/06. The financial for ACIPS/PPL are only complete through the end of its fiscal year. There are some entries after that but they are incomplete as ACIPS/PPL switched to their own system as of 7/1/2006.

In addition, none of ACI's entities' financials are final until reviewed by their accountant. There will likely be changes before the corresponding tax returns are filed. In reviewing the records prior to production, Mr. Keeton has discovered some errors which he will be discussing with his accountant whether they are material enough to require correction. Some expenses were coded incorrectly but likely will not change any tax liability.

Finally, there are no documents responsive to Item No. 11. In addition, per our agreement, we are not producing the records and account statements for the corporate American Express charge cards as the Corporation Commission has already subpoenaed these documents directly from American Express.

Should you have further questions, please do not hesitate to call me at the above referenced number.

Very truly yours,

Ashley Adams Feldman

8765 East Bell Road, Suite 110, Scottsdale, Arizona 85260

480.444.3500 866.288.0247 f 480.444.1270

www.phoenixlawgroup.com

Index for documents produced by ACI/CSI on October 20, 2006 in response to subpoena dated September 21, 2006.

1. Bates Nos. JK000001-JK00163: CSI Technologies' Articles of Incorporation and related documents; (Not responsive to any request—provided for convenience)
2. Bates Nos. JK000164-JK000180: Sixthcai, Inc. Articles of Incorporation (Public shell that Jim Keeton bought and then rolled Circuit Source into the shell. Thereafter CSI bought Avanti Circuits and bought the asset of Circuit Technologies in Atlanta, and then moved Circuit Source to Atlanta.) (Not responsive to any request-provided for convenience.)
3. Bates Nos. JK000181-JK000184: Circuit Sources International Bylaws (Nor responsive to any request-provided for convenience.)
4. Bates Nos. JK000185-000211: Minutes of Meetings of Board of Directors' of Circuit Source International Inc. (Nor responsive to any request-provided for convenience.)
5. Bates Nos. JK000212-000231: Documents related to Circuit Source International's name change to CSI Technologies. (Nor responsive to any request-provided for convenience.)
6. Bates Nos. JK 000232-00233: Letter of resignation of Steven Scronic. (Nor responsive to any request-provided for convenience.)
7. Bates Nos. JK 000234-000241: Correspondence with Securities & Exchange Commission (Nor responsive to any request-provided for convenience.)
8. Bates Nos. JK000242-000245: Corporation Commission filing for Circuit Source Inc. (Nor responsive to any request-provided for convenience.)
9. Bates Nos. JK000246-000277: CSI Technologies Minutes and Resolutions. (Nor responsive to any request-provided for convenience.)
10. Bates Nos. JK000278-280: ACI Holdings and ACI Power Systems Financial Transactions with NCGMI. (Responsive to Item No. 2 on Exhibit A.)
11. Bates Nos. JK000281-284: List of CSI Investors. (Responsive to Item No. 4 on Exhibit A.)

12. Bates Nos. JK000285-JK00968: CSI Investor files. (Responsive to Item Nos. 4, 5 and 6 and 8 on Exhibit A.)

13. Bates Nos. JK 000969-JK0140: Additional Investor files. (These investors are the only investors who received any payments or dividends.) (Responsive to Item Nos. 4-8 on Exhibit A.)

14. Bates Nos. JK001141-JK001198: American Church Trust Loan to Circuit Source International. (Responsive to Item Nos. 3 and 12 on Exhibit A.)

15. Bates Nos. JK00199-JK1373: Edward Purvis/POA Blessings, Pia Schanlin Pine Cone Loan to CSI Technologies and corresponding Promissory Notes: (Responsive to Item Nos. 3 and 12 on Exhibit A.)

16. Bates Nos. JK001374-001700: CSI Technologies, Inc.'s notes. (Responsive to Item No. 3 on Exhibit A.)

17. Bates Nos. JK0011701-JK001851: Avanti Circuit Inc.'s notes. (Responsive to Item No. 3.)

18. Bates Nos. JK001852-JK2019: Documents related to various brokers used in any CSI Technologies, Inc. transactions. (Responsive to Item No. 9 on Exhibit A.)

19. Bates Nos. JK002020-002140: Documents related to any mergers, acquisitions, spin-offs or predecessor entities. Note: The Design Solutions deal was rescinded.)

Index Label Number	Description
ACC7146-7146	CDI
ACC7149-7150	Custody of Records CP
ACC7151-7156	PURVIS
ACC7157-7159	Keaton Work History
ACC7160-7171	ACI Articles of Incorporation
ACC7172-7181	ACI Bylaws
ACC7182-7220	Minutes
ACC7221-7224	ACI Corporate DS
ACC7225-7227	P/L Balance Sheet June 04/June 05
ACC7228-7230	P/L Balance Sheet 04/03
ACC7231-7235	AVANTI Circuits P/L Balance July 03/June 04
ACC7236-7240	AVANTI Circuits P/L Balance July 04/June 05
ACC7241-7245	ACI Power Systems P/L Balance July 04/July 05
ACC7246-7249	ACI Power Systems P/L Balance July 03/June 04
ACC7250-7260	AVANTI Circuits Independent Audit Report
ACC7263-7277	ACI Holding – IRS 05
ACC7278-7291	ACI Tax Return 2003
ACC7292-7333	ACI Holding Tax Return 2004
ACC7334-7336	ACI Holding Life Insurance for Keaton
ACC7337-7343	ACI Design, Inc. Dissolution
ACC7344-7361	ACI Design Inc Stock Exchange 9/2/03
ACC7362-7392	ACI Holding PPM
ACC7393-7413	ACI Agent
ACC7414-7416	Representation Agent / CAHILL
ACC7417-7434	ACI Shareholder List
ACC7435-7473	Incestor File – STC
ACC7474-7481	Investor file – Andrew Recovable Trust – Exchange AG W/CS/
ACC7481-7497	Investor file – STC FBO Catherine Barnowski
ACC7498-7499	Investor file – BSSC Enterprise Limited/Partnership
ACC7500-7517	STC/FBO Jimmy R. Bean / SA
ACC7518-7519	Douglas / Nancy Beel – Stock
ACC7520-7585	STC / FBO Anita May Baler Trust / SA
ACC7586-7622	STC / FBO Joanne B
ACC7623-7624	Business Partners Stock
ACC7625-7631	Steve Capozza – Common Stock / Exchange AG
ACC7632-7640	Capstone Investments / EA
ACC7641-7642	Phillip & Dora Carpen / Stock
ACC7643-7651	Jean Domonique Charlas / EA
ACC7652-7654	Mark Chmura Common Stock
ACC7655-7656	Ron Conquet Common Stock
ACC7657-7658	Burge Coppins Common Stock
ACC7659-7683	STC/FBO Joseph Coquillal / SA
ACC7684-7702	STC / FBO Christina Lynn Irwin / SA

ACC7703-7720	STC / FBO Donald L Dunn / SA
ACC7721-7738	STC/ FBO Pamela Melinda Dunn / SA
ACC7739-7758	STC / FBO Jeff Flammer / SA
ACC7759-7768	Wedbush Morgan Securities / FBO Darrel Fraynd
ACC7769-7772	Jeffrie Frisch Michael Friedman/ Common Stock
ACC7773-7807	STC / FBO Allen Gerace / SA
ACC7808-7812	Gregg Goehner / Exchange AG
ACC7813-7814	Mark Foroff
ACC7815-7833	STC / FBO Brando L Goshow / SA
ACC7834-7851	STC / FBO Gloria K. Goshow / SA
ACC7870-7887	STC / FBO Leon K. Goshow / SA
ACC7888-7905	STC / FBO Leon K Goshow / SA
ACC7906-7923	STC / FBO Stella Goshow / SA
ACC7924-7925	Guy Gregg / Stock
ACC7926-7927	Terrance Gregg / Stock
ACC7928-7929	Vann Gregg / Stock
ACC7930-7940	STC / FBO Dawn Grieco / SA
ACC7941-7978	STC / FBO Dawn Grieco / SA
ACC7979-813	Nancy Haas / SA
ACC8014-8015	Richard T. Hall / Stock
ACC8016-8031	STC / FBO Janet Halt / SAA
ACC8050-8067	STC / FBO Ralph Holt / SA
ACC8068-8070	Michael Horan / Stock
ACC8071-8072	STC / Thomas E Hubbard / only stock
ACC8075-8076	Willard Hunter / Stock
ACC8077-8078	James Keaton Sr. / Stock
ACC8079-8080	William Keaton / Stock
ACC8081-8082	Law Investments
ACC8083-8084	Douglas L. Luscombe / Stock
ACC8085-8092	William L. & Wilhelmina A Luscombe / Stock
ACC8093-8094	Robert Luther / Trustees of Luther Living Trust / Stock
ACC8095	Blank folder for Dennis Malone
ACC8096-8100	Mayday Investors / Exchange Agreement Timothy Brink
ACC8101-8102	Sloan M. Miles / Stock
ACC8103-8107	Janice Montana / Stock / Exchange AG
ACC8108-8111	NCSMI Stock (Ten Million shares)
ACC8112-8120	DUC NGO / Stock
ACC8121-8122	Eugene Palmer / Stock
ACC8123-8124	Shauna Palmer / Stock
ACC8125-8141	STC / FBO Jack Parriot / SA
ACC8143-80147	Robert Ragland / Exchange AG
ACC8148-8156	Loren Reeder / Exchange Agreement (ltr to Wedbush)
ACC8157-8164	Scott Reeder / EA /
ACC8165-8200	STC / FBO Dennis Rose / SA /
ACC8201-8218	STC / FBO Majorie Lee Rose / SA

ACC8219-8220	Brian Schroeder / Stock
ACC8221-8222	Steven J. Scronic / Stock
ACC8223-8238	STC / FBO Anthony Senarighi / SA / Release
ACC8239-8246	Cynthia Singleton / EA
ACC8247-8252	Dr/ Theodore Staahl / Promissory Note Conversion AG
ACC8253-8270	STC / FBO Barbara Sullivan / SA
ACC8271-8288	STC / FBO Bill D. Sullivan / SA
ACC8289-8290	Steven Tappan / Stock
ACC8291-8310	STC / FBO Harry Van Aken/ SA
ACC8311-8318	Curtis and Amy Wang / EA
ACC8319-8338	STC / FBO Lynn Anne Weigang / EA
ACC8339-8345	Vincent E and Jay V. Williams / Stock EA
ACC8346-8347	Darren P. Young / Stock
ACC8348-8365	STC / FBO David M. Zappia / SA
ACC8366-8370	Zolecki Family Trust / EA
ACC8371-8381	Edward A. Zybow / EA / Stock
ACC8382-8386	Joan & Teryl Zubow / EA
ACC8387-8409	AVANTI Circuits Wells Fargo Bank Statements 7/03-6/04
ACC8410-8434	AVANTI Circuits Wells Fargo Bank Statements 7/04-6/05
ACC8435-8473	AVANTI Circuits Wells Fargo Bank Statements 7/05-6/06
ACC8474-8497	ACI Holdings Home National Bank Statements 7/04-6/05
ACC8498-8518	ACI Holdings Home National Bank Statements 7/05-6/06
ACC8519-8543	ACI Holdings Home National Bank Statements 9/03-6/04
ACC8544-8580	ACI Power Home National Bank Statements 7/05-6/06
ACC8581-8633	AVANTI Circuits Home National Bank Stmts 7/03-6/04
ACC8634-8860	AVANTI Circuits Home National Bank Stmts 7/04-6/05
ACC8861-9094	AVANTI Circuits Home National Bank Stmts 7/05-6/06

and, the CD Rom representing the QuickBooks of ACI Holdings' companies.



COMMISSIONERS
MIKE GLEASON - Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

BRIAN C. McNEIL
EXECUTIVE DIRECTOR



MATTHEW J. NEUBERT
DIRECTOR

SECURITIES DIVISION
1300 West Washington, Third Floor
Phoenix, AZ 85007
TELEPHONE: (602) 542-4242
FAX: (602) 594-7470
E-MAIL: securitiesdiv@azcc.gov

ARIZONA CORPORATION COMMISSION

September 12, 2007

SENT VIA FIRST CLASS MAIL & E-MAIL

John O'Neal, Quarles & Brady LLP
One Renaissance Square/ Two North Central Ave
Phoenix, AZ 85004

Re: Edward Purvis, Maureen Purvis *et. al.* - Docket No. S-20482A-06-0631


Dear Mr. O'Neal:

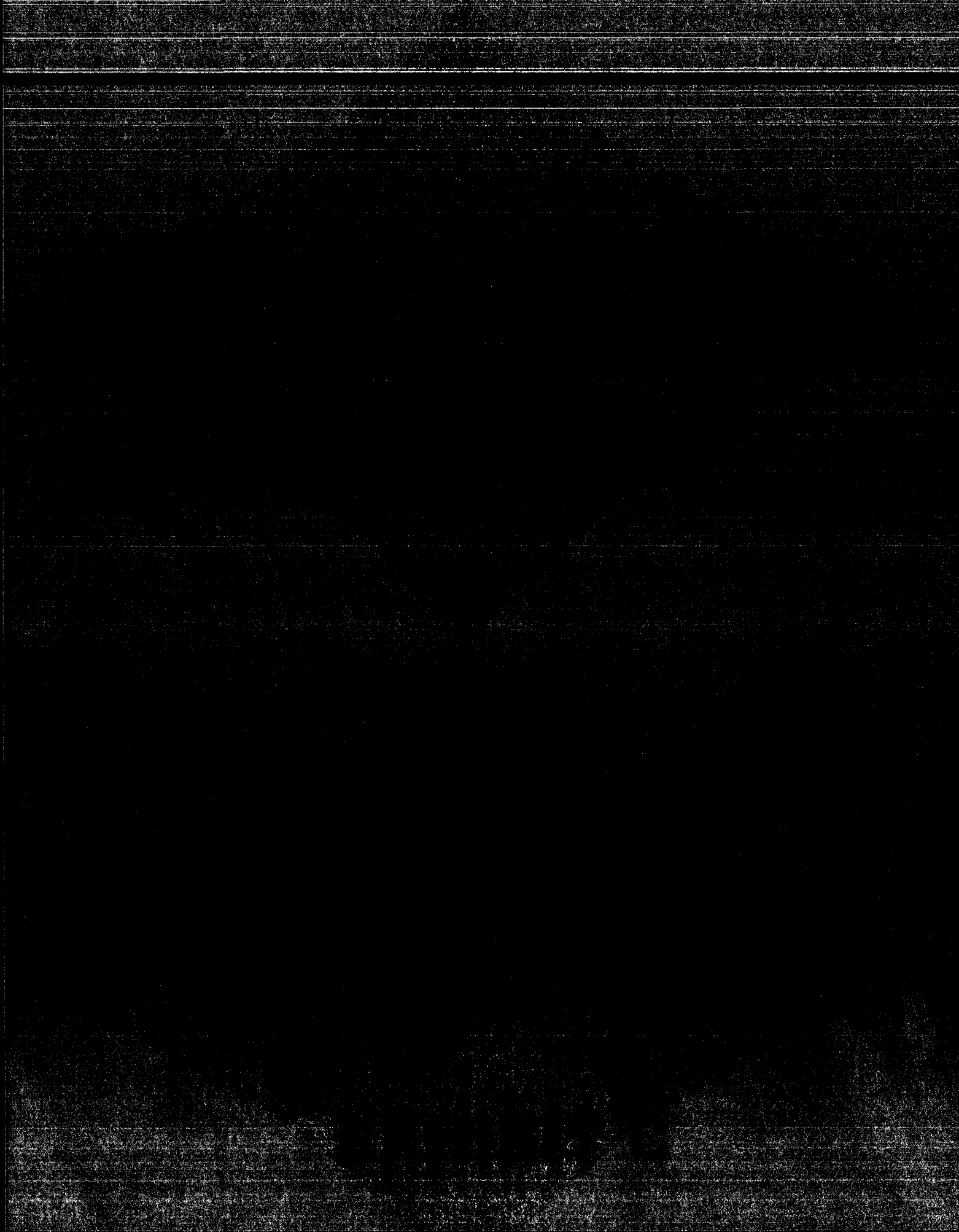
As we discussed earlier today, the Director has made available the Keaton/ACI/CSI documents for your review at our office. You did not make arrangements to review the records; instead you requested all the records be copied for you (although many of these records have already been provided to you). At your request, I have asked what the cost would be to have the whole set of documents copied. The cost to copy the records in-house would be \$0.10 a page and we estimate there are approximately 4 reams of documents (2,000 pages) total. **We will arrange to make the copies after you authorize payment in writing.** Your suggestion that the records be copied at your copy center will require the time of our personnel to accompany the records. At this time, I am uncertain who is available from our staff, and when.

As I informed you, before I expend any more time on this matter, I would like to know how you would like to proceed in view of the fact that some information from the records you seek had to be redacted. Specifically, there is confidential data (*i.e.* bank account numbers, e-mail addresses, etc.) in the records that you requested. This information is statutorily protected and therefore we are legally barred from providing you the documents as we received them. Instead, we expended time redacting the protected information so that you could have access to the records.

We secured permission from the Director to release the records, redacted the protected data, and informed you as soon as possible. You proceeded to apply to get a subpoena issued to the source of the documents. Now, I need to know how you wish to proceed before we go any further. Are you going to directly obtain the records from Mr. Keaton? Or do you still desire the copies from us and authorize the costs? Please advise. I will be out of the office until Monday (9/17), if you need to discuss this further, please communicate with Rachel Strachan at rstrachan@azccc.gov.

Sincerely,


Shoshana O. Epstein
Staff Attorney



O'Neal, John M.

From: O'Neal, John M.
Sent: Tuesday, October 02, 2007 10:46 AM
To: 'Rachel Strachan'
Subject: RE:

Thank you. I have read these statutes, and I need some clarification as to what information has been redacted from the documents.

ARS 44-1373 requires redaction of social security numbers only. My understanding from my discussion with Shoshanna was that more than just SSNs were redacted. For example, I understood that names, addresses, and other identifying information was redacted.

ARS 44-2042 is, as you know, the general confidentiality statute. We could debate whether that statute applies given that the Securities Division filed its case and has put the documents and information at issue. But more importantly, my understanding was that the Securities Division had agreed to produce the documents received from Ashley's clients and as such had waived/released a claim of confidentiality under the ARS 44-2042.

In sum, can you please tell me: what information beyond SSNs has been redacted; and correct my misunderstanding about the Securities Division's position.

Thank You.

John Maston O'Neal

Partner
Quarles & Brady LLP
One Renaissance Square
Two North Central Ave
Phoenix, AZ 85004

Direct Dial: (602) 229-5436
Fax: (602) 229-5690
E-mail: joneal@quarles.com

From: Rachel Strachan [<mailto:RStrachan@azcc.gov>]
Sent: Tuesday, October 02, 2007 10:30 AM
To: O'Neal, John M.
Subject: RE:

A.R.S. §§ 44-1373 and 44-2042.

From: O'Neal, John M. [<mailto:JONEAL@quarles.com>]
Sent: Tuesday, October 02, 2007 9:40 AM
To: Shoshana Epstein; Rachel Strachan
Subject:

Dear Shoshana and Rachel - as you know, the Securities Division has redacted information from the documents it received from ACI/Keaton/CSI. The Division claims that it is required to redact such information pursuant to

10/5/2007

statute. Can you please provide me the statute and/or legal authority which requires redaction? I am unaware of such authority.

Thank You.

John Maston O'Neal

Quarles & Brady

Partner
Quarles & Brady LLP
One Renaissance Square
Two North Central Ave
Phoenix, AZ 85004

Direct Dial: (602) 229-5436
Fax: (602) 229-5690
E-mail: joneal@quarles.com

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postmaster@azcc.gov =====

O'Neal, John M.

From: O'Neal, John M.
Sent: Thursday, October 04, 2007 7:03 AM
To: 'Rachel Strachan'
Cc: Shoshana Epstein; Julie Coleman
Subject: RE:

Was it produced?

From: Rachel Strachan [mailto:RStrachan@azcc.gov]
Sent: Wednesday, October 03, 2007 4:57 PM
To: O'Neal, John M.
Cc: Shoshana Epstein; Julie Coleman
Subject: RE:

In regards to your first question, all personal identifying information including names, addresses, telephone numbers, e-mail addresses and account numbers have been redacted from the documents produced to you. As far as your second question, if the Division intended to use Mr. Keaton's financial information it would have been produced to you pursuant to Judge Stern's procedural order.

From: O'Neal, John M. [mailto:JONEAL@quarles.com]
Sent: Wednesday, October 03, 2007 11:29 AM
To: Rachel Strachan
Cc: Ashley Adams
Subject: RE:

Ok, thank you for stating the Division's position regarding the law, but what has been redacted besides SSNs?

Also, what is the answer to my question regarding the financial information related to Ashley's client and her question regarding CSI investors?

John Maston O'Neal
Partner
Quarles & Brady LLP
One Renaissance Square
Two North Central Ave
Phoenix, AZ 85004

Direct Dial: (602) 229-5436
Fax: (602) 229-5690
E-mail: joneal@quarles.com

From: Rachel Strachan [mailto:RStrachan@azcc.gov]
Sent: Wednesday, October 03, 2007 11:29 AM
To: O'Neal, John M.
Subject: RE:

10/5/2007

The redacted information is confidential. The Division does not have the authority to share such information with you.

From: O'Neal, John M. [mailto:JONEAL@quarles.com]
Sent: Wednesday, October 03, 2007 10:50 AM
To: Rachel Strachan; Shoshana Epstein; Ashley Adams
Subject:

I have not received answers to my emails yesterday. Please know that if no such answers are provided tomorrow, I will be forced to file a motion to compel with the Judge.

John Maston O'Neal



Partner
Quarles & Brady LLP
One Renaissance Square
Two North Central Ave
Phoenix, AZ 85004

Direct Dial: (602) 229-5436
Fax: (602) 229-5690
E-mail: joneal@quarles.com

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provide in this email or any attachment concerning federal tax issues or submissions
intended or written to be used, and cannot be used, to avoid federal tax penalties.

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10/5/2007

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It includes a detailed description of the experimental procedures and the statistical analysis performed.

3. The third part of the document presents the results of the study. It includes a series of tables and graphs that illustrate the findings of the research. The data shows a clear trend of increasing activity over time.

4. The fourth part of the document discusses the implications of the findings. It suggests that the results have significant implications for the field of study and may lead to further research in this area.

5. The fifth part of the document concludes the study. It summarizes the main findings and provides a final statement on the importance of the research.

O'Neal, John M.

From: O'Neal, John M.
Sent: Thursday, October 04, 2007 8:55 AM
To: 'Julie Coleman'
Cc: 'Rachel Strachan'; Shoshana Epstein
Subject: RE:

I think we are going round and round on this. How about I go back to my original question:

Under these circumstances, I need to know from the Securities Division whether any of the allegations against my client are predicated on or related to the financial condition of Ashley's client, or if the financial information her client produced will be used in any fashion at the hearing.

Please say yes or no.

Thank you

From: Julie Coleman [mailto:Jcoleman@azcc.gov]
Sent: Thursday, October 04, 2007 8:47 AM
To: O'Neal, John M.; Rachel Strachan
Cc: Shoshana Epstein
Subject: RE:

The information was not included on the Division's witness and exhibit list.

Julie A. Coleman
Assistant Chief Counsel of Enforcement
Arizona Corporation Commission, Securities Division
1300 W. Washington St., Third Floor
Phoenix, AZ 85007
Direct Phone: (602) 542-0639
Mobile: (602) 763-2455
Fax: (602) 594-7427
Email: jcoleman@azcc.gov

From: O'Neal, John M. [mailto:JONEAL@quarles.com]
Sent: Thursday, October 04, 2007 7:03 AM
To: Rachel Strachan
Cc: Shoshana Epstein; Julie Coleman
Subject: RE:

Was it produced?

From: Rachel Strachan [mailto:RStrachan@azcc.gov]
Sent: Wednesday, October 03, 2007 4:57 PM
To: O'Neal, John M.

10/5/2007

Cc: Shoshana Epstein; Julie Coleman
Subject: RE:

In regards to your first question, all personal identifying information including names, addresses, telephone numbers, e-mail addresses and account numbers have been redacted from the documents produced to you. As far as your second question, if the Division intended to use Mr. Keaton's financial information it would have been produced to you pursuant to Judge Stern's procedural order.

From: O'Neal, John M. [mailto:JONEAL@quarles.com]
Sent: Wednesday, October 03, 2007 11:29 AM
To: Rachel Strachan
Cc: Ashley Adams
Subject: RE:

Ok, thank you for stating the Division's position regarding the law, but what has been redacted besides SSNs?

Also, what is the answer to my question regarding the financial information related to Ashley's client and her question regarding CSI investors?

John Maston O'Neal
Partner
Quarles & Brady LLP
One Renaissance Square
Two North Central Ave
Phoenix, AZ 85004

Direct Dial: (602) 229-5436
Fax: (602) 229-5690
E-mail: joneal@quarles.com

From: Rachel Strachan [mailto:RStrachan@azcc.gov]
Sent: Wednesday, October 03, 2007 11:29 AM
To: O'Neal, John M.
Subject: RE:

The redacted information is confidential. The Division does not have the authority to share such information with you.

From: O'Neal, John M. [mailto:JONEAL@quarles.com]
Sent: Wednesday, October 03, 2007 10:50 AM
To: Rachel Strachan; Shoshana Epstein; Ashley Adams
Subject:

I have not received answers to my emails yesterday. Please know that if no such answers are provided tomorrow, I will be forced to file a motion to compel with the Judge.

John Maston O'Neal


10/5/2007

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